

UNITED STATES BANKRUPTCY COURT
DISTRICT OF OREGON

In re) Case No. _____
)
)
) NOTICE OF MOTION
) PURSUANT TO 11 U.S.C. §522(f)
) FOR AVOIDANCE OF LIEN
)
)
Debtor(s))

A motion, copy attached, was filed on behalf of the debtor(s) to avoid a lien pursuant to 11 U.S.C. §522(f).

The name and address of the debtor's attorney (or debtor(s), if no attorney) are:

The debtor's address and Taxpayer ID#(s) (last 4 digits) are: _____
_____.

If you wish to resist the motion you must, within 14 days of the service date shown below, file both a written response, and a certificate showing a copy of the response has been served on the person named above, with the Clerk of the Bankruptcy Court.

Contents of Response - A response must state the facts upon which the motion is resisted. See Local Form [#717.15](#) for details.

If you file a timely response, and the Court requires a hearing, all parties will be given notice of the hearing date, time, and location.

Failure to Respond - If no timely response is filed, the court may sign an ex parte order, submitted by the debtor(s), granting the motion.

Filing Address - If the 5-digit portion of the Case No. begins with "3" or "4", mail to 1001 SW 5th Ave. #700, Portland OR 97204; OR if it begins with "6" or "7", mail to 405 E 8th Ave. #2600, Eugene OR 97401. ECF participants must file electronically.

Clerk, U.S. Bankruptcy Court

I certify on _____ copies of this Notice, and the Motion, were served on the Trustee, U.S. Trustee, and all other parties named in the motion, whose names and addresses are listed below (Please Note: Service must be made pursuant to Fed. Bankruptcy Rule 7004 (e.g., 7004(b)(3) for corporations)):

Debtor's or Debtor's Attorney's Signature OSB #

717 (12/1/13) ****LOCAL FORM #717.15 ATTACHED IF this Notice served ON PAPER****

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5 IN THE UNITED STATES BANKRUPTCY COURT
6 FOR THE DISTRICT OF OREGON

7 IN RE:) Case No. 15-32928-rld7
8)
9 Monthiene Singkhek)
10) MOTION TO AVOID LIENS
Debtor,) PURSUANT TO §522(f)

- 11 1. The name and address of the secured party to lien is Ray Klein, Inc. PO Box 7548,
12 Springfield, Oregon 97474
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14 2. The claims for relief are requested pursuant to 11 U.S.C. §522(f)(1)(A).
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16 3. The secured party claims judicial liens on Debtor's residential real property.
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18 4. Pertinent information is as follows:
19 a. Home Value: \$110,381.00
20 b. Consensual Liens: Ocwen Loan Servicing
21 c. Senior Lien: \$89,636.00
22 d. Liens to be avoided:
23 f. Ray Klein, Inc.
24 i. Circuit Court of Oregon, Multnomah County, Case No.:15SC00260
25 ii. Entered: April 1, 2015
26 e. Address: 23919 NE Poplar Court, Wood Village, Oregon 97060

1 f. Multnomah County Property Tax Account No. R or alternate No.: R288936

2 g. Legal Description: Code area 241; Treehill Park Condominiums, Lot P3919

3 h. Exemption Claimed: \$20,745.00

4 i. Exemption Impaired: All.

5 5. The Judgment Liens impair Debtor's homestead exemption under ORS 18.395 to which
6 Debtor is entitled.

7 6. The lien in the above property should be avoided in full.

8 DATED: June 18, 2015

9
10 /s/ Lyndon L. Ruhnke

11 _____
12 Lyndon Ruhnke, OSB No. 993540
13 Attorney for Debtor

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